## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

| MARC VEASEY, JANE HAMILTON, SERGIO DELEON, FLOYD J. CARRIER, ANNA BURNS, MICHAEL MONTEZ, PENNY POPE, OSCAR ORTIZ, KOBY OZIAS, JOHN MELLOR-CRUMLEY, PEGGY HERMAN, EVELYN BRICKNER, GORDON BENJAMIN, KEN GANDY, LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC), AND DALLAS COUNTY, TEXAS, | ) ) ) ) ) ) ) ) )  |
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| Plaintiffs, v.  RICK PERRY, Governor of Texas; and JOHN STEEN, Texas Secretary of State,  Defendants.   | ) CIVIL ACTION NO. ) 2:13-CV-193 (NGR) ) [Lead case] ) )             |
| UNITED STATES OF AMERICA,  Plaintiffs,  TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, IMANI CLARK, AURICA WASHINGTON, CRYSTAL OWENS, AND MICHELLE BESSIAKE,  Plaintiff-Intervenors,  | ) ) ) ) ) ) ) ) )  |
| TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, HIDALGO COUNTY, AND MARIA LONGORIA BENAVIDES, Plaintiff-Intervenors, v.   | ) ) ) ) ) CIVIL ACTION NO. ) 2:13-CV-263 (NGR) ) [Consolidated case] |
| STATE OF TEXAS, JOHN STEEN, in his official capacity as Texas Secretary of State; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,  Defendants.  TEXAS STATE CONFERENCE OF NAACP  | ) ) ) ) ) ) ) ) ) )  |

| BRANCHES; and the MEXICAN AMERICAN LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF REPRESENTATIVES,  Plaintiffs, v.   | )<br>)<br>)<br>)   |
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| JOHN STEEN, in his official capacity as Secretary of State of Texas; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,  *Defendants*. | ) CIVIL ACTION NO. ) 2:13-CV-291 (NGR) ) [Consolidated case] ) |
| BELINDA ORTIZ, LENARD TAYLOR,  | )  |
| EULALIO MENDEZ JR., LIONEL   | )  |
| ESTRADA; ESTELA GARCIA ESPINOSA,   | )  |
| ROXANNE HERNANDEZ, LYDIA LARA,   | )  |
| MARGARITO MARTINEZ LARA,   | )  |
| MAXIMINA MARTINEZ LARA, AND  | )  |
| LA UNION DEL PUEBLO ENTERO, INC.   | )  |
| Plaintiffs,  | ,<br>)   |
| V.   | )  |
| STATE OF TEXAS; JOHN STEEN, in his   | )  |
| Official capacity as Texas Secretary of State;   | ) CIVIL ACTION NO.   |
| And STEVE McCRAW, in his official capacity   | ) 2:13-CV-348 (NGR)  |
| As Director of the Texas Department of   | ) [Consolidated case]  |
| Public Safety,   | )  |
| Defendants.  | )  |
|  |  |

## [PROPOSED] ORDER ON DEFENDANTS' MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS RESPONSIVE TO THE STATE OF TEXAS' FIRST AND SECOND REQUESTS FOR PRODUCTION TO THE UNITED STATES

Having considered Defendants' Motion to Compel the Production of Documents Responsive to the Defendants' First and Second Requests for Production to the United States, the Court finds that the Motion should be, and hereby is, GRANTED. The United States shall promptly produce the documents and electronically held information it has withheld on the basis

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of the common interest doctrine and investigatory and law enforcement privilege. Additionally,

given the deficiencies in the United States' amended privilege log, the United States shall

promptly produce under protective order all documents for which it has not correctly asserted the

attorney-client privilege, work product doctrine, or deliberative process privilege in accordance

with the specificity requirements under Federal Rule of Civil Procedure 26(b)(5)(A)(ii) and the

agreed terms of the Agreement Concerning Production Format, ECF No. 61-6.

SO ORDERED.

| Date: | , | 2014. |
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NELVA GONZALES RAMOS United States District Judge